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BEFORE THE ARIZONA CORPORATION COMMISSION

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Commissioner

Arizona Corporation Commission

**DOCKETED**

MAR 26 2004

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In the Matter of the Application of OCMC, )  
Inc. to Obtain a Certificate of Convenience )  
and Necessity From One Call )  
Communications, Inc. d/b/a Opticom to )  
Provide Telecommunications Services as a )  
Provider of Resold Interexchange Services )  
and Alternative Operator Services Within )  
the State of Arizona )  
)

Docket No. T-04103A-02-0274

Docket No. T-02565A-02-0274

**VERIFIED AMENDMENT TO  
APPLICATION AND RESPONSE  
TO MOTION TO VACATE  
HEARING**

OCMC, Inc. ("OCMC"), through this filing, amends its application in the above-referenced dockets to request a waiver pursuant to AAC R14-2-1006 to allow it to complete zero minus (0-) calls, including emergency calls, over OCMC's telecommunications network.

In support of this request, OCMC states the following:

**GENERAL INFORMATION**

1  
2 1. OCMC is currently authorized to provide zero-minus (0-) emergency call  
3 completion and operator assisted services in Alaska, Connecticut, Delaware, Florida, Hawaii,  
4 Idaho, Illinois, Iowa, Kansas, Maine, Maryland, Massachusetts, Michigan, Missouri,  
5 Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Dakota, Oregon,  
6 Pennsylvania, Rhode Island, South Dakota, Tennessee, Texas, Utah, Virginia, Vermont and  
7 Washington. To the best of OCMC's knowledge, no complaints have been filed with the  
8 relevant regulatory authorities or have been received by OCMC in connection with its 0- call  
9 completion authority.  
10  
11

**DESCRIPTION OF OCMC'S FACILITIES**

12  
13 2. OCMC provides 24-hour, seven day a week long distance and AOS services  
14 over its telecommunications network by reselling leased capacity from underlying, facilities-  
15 based carriers such as MCI Worldcom, Qwest, and Broadwing. This leased capacity is  
16 switched through OCMC's digital switches located in Indiana.  
17

18 3. OCMC's switches operate in tandem, enabling it to achieve a 15,504 port  
19 capacity on its network. Traffic through the switches is monitored via alarm printers at  
20 OCMC's Network Control Center in Indianapolis. Alarm contacts are monitored by  
21 Sonitrol, OCMC's alarm contractor. Back-up power is installed at each switch location. In  
22 the event of a switch malfunction during normal business hours, the alarm printers are  
23 monitored on a real time basis being at the Network Control Center. After normal business  
24 hours, all switching and transmission equipment is monitored with alarm contacts which alert  
25  
26

1 Sonitrol in case of any outages. Software and hardware maintenance contracts are  
2 maintained for all network switches. These contracts provide 24-hour on-call technicians for  
3 quick response time. Each switch is also equipped with modem access for OCMC's  
4 switching vendors for direct access for problem diagnostic and restoral. All switching and  
5 transmission equipment have redundancy built into them. A spare parts kit is maintained at  
6 each switch site, as well, for the technicians to service hardware failures as quickly as  
7 possible.  
8

9  
10 4. OCMC's live operator service centers (the "Operator Centers") are located in  
11 Carmel, Indiana and the Dominican Republic. The Operator Centers have capacity for up to  
12 150 operator stations, which are appropriately staffed to meet seasonal, daily and hourly peak  
13 traffic on OCMC's network. Operator stations are currently 75 percent staffed on a regular  
14 basis. Additional stations will be staffed as traffic dictates. Each operator station is  
15 supported by custom-designed software residing on a local area network ("LAN") installed at  
16 the Operator Centers, which have emergency back-up power and redundant equipment  
17 installed. The Operator Centers are supported by a standby power generator for use in the  
18 event of a power outage.  
19

20  
21 5. OCMC's operators attend a mandatory one (1) week training seminar. OCMC  
22 currently employs 190 operators with new trainees starting classes approximately every two  
23 weeks. OCMC's supervisor-to-operator ratios vary somewhat per hour of the day, but  
24 average approximately one (1) supervisor for every twenty (20) operators.  
25  
26

1           6.       OCMC's operator platform switching equipment is built in a star configuration  
2 with the Operator Center switch serving as host switching node. Diverse DS1s interconnect  
3 the four remote switches to OCMC's Operator Center switch. Signaling protocol used on the  
4 IMT's (Inter Machine Trunks [DS-1s]) is performed through HIL (pseudo SS7) out-of-band  
5 signaling, which provides the user with fast call processing. The call is routed to the operator  
6 station via digital extension (1B+D), arriving with caller origination, caller destination,  
7 switch identification and routing information. Upon call arrival to the operator station,  
8 account information is transmitted via LAN connections (multi-port repeater) from redundant  
9 high performance file servers. Before the call is processed, a validation packet is sent to  
10 SNET through a dedicated 9600 circuit via X.25 with dial backup capabilities.

11           7.       OCMC's telecommunications network described above is engineered and  
12 maintained for P.01 grade of service or better.

13                   **DESCRIPTION OF ZERO MINUS CALL COMPLETION PROCEDURES**

14           8.       OCMC proposes to use the following 0- call completion procedures in  
15 Arizona. The procedures generally follow the procedures successfully used by OCMC in  
16 other states, but OCMC does not plan to offer its services through Feature Group B (FGB)  
17 facilities access in Arizona at this time. Therefore, OCMC describes 0- call completion  
18 procedures herein assuming Feature Group D (FGD) and 800 access facilities only.

19           9.       Prior to the provision of any OCMC services on equipment owned or operated  
20 by any aggregator, such customer must complete a "Property Database Form" pursuant to its  
21 contract with OCMC. The information obtained from the property owner or operator is  
22

1 entered into OCMC's database, which resides on the LAN. In addition to ANI and location  
2 information, the customer must provide emergency phone numbers applicable to the location  
3 at which the phone instruments will be employed. OCMC anticipates that it will, no less than  
4 semi-annually, place verification calls on a 100 percent sampling basis to emergency service  
5 providers to ensure the accuracy of OCMC's database.  
6

7 10. OCMC's custom software provides its operators with ANI, destination number  
8 and call type information at the operator station. If the caller requests emergency assistance,  
9 the operator presses a single keystroke combination and a "pop-up" window appears on the  
10 operator station identifying the caller's location and the emergency phone numbers  
11 applicable to that location. The ANI remains in view. Each emergency phone number is  
12 single numbered in the pop-up window; the operator need only press the appropriate single  
13 number to initiate call placement to the emergency service provider requested. An additional  
14 single keystroke immediately adds the caller back on the line while the emergency call  
15 provider's number is rung. The OCMC operator remains on the line until the emergency call  
16 is successfully completed. The operator is instructed to provide location information to the  
17 emergency service provider dispatcher in the event the caller hangs up, is hysterical, or is  
18 otherwise non-communicative.  
19  
20  
21

22 11. Once the emergency call is completed, the operator completes a "trouble  
23 ticket," which documents call detail including originating telephone number and location, the  
24 emergency service provider to which the call was transferred, the date of the call, the time the  
25 call was received, the time the call was connected to the emergency service provider, and a  
26

1 brief description of the nature of the emergency call, including the extent of the injury, if  
2 known.

3 12. Emergency situations may require supervisor intervention. Supervisors are  
4 notified if the operator is unable to place the requested emergency call. If notified, the  
5 supervisor receives all pertinent call screen and caller information from the operator and then  
6 contacts Directory Assistance in the emergency request area. After receiving the requested  
7 emergency agency number, the supervisor places a call to the emergency agency and  
8 provides the relevant information. The supervisor then notifies the operator to let the caller  
9 know that the emergency agency in that area has been contacted. Intervention by an OCMC  
10 supervisor is documented in the "trouble ticket" described in paragraph 11, above.  
11  
12

### 13 **REQUEST FOR WAIVER**

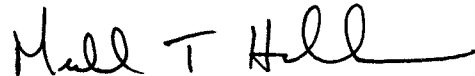
14 13. OCMC endorses the Commission's goals to maintain the highest quality  
15 standards of service in the Arizona telecommunications industry. OCMC fully understands  
16 the important role that the Arizona telecommunications network has in furthering the public  
17 interest, and in achieving and maintaining the highest degree of reliability and  
18 professionalism needed in supporting emergency responses. Accordingly, OCMC  
19 respectfully requests the Commission pursuant to the waiver provision provided in ACC  
20 R14-2-1006, grant OCMC the authority for completing zero minus (0-) calls over OCMC's  
21 network, including the completion of emergency calls.  
22  
23  
24  
25  
26

**MOTION TO VACATE HEARING**

14. Through this filing, OCMC notes its support for Staff's Motion to Vacate Hearing and concurs with Staff's conclusion that this matter may be resolved without a hearing. OCMC further submits that the waiver requested in this Amendment may be resolved without a hearing and that Staff may address the appropriateness of this waiver through an amendment to its Staff Report.

DATED this 26<sup>th</sup> day of March, 2004.

LEWIS AND ROCA LLP



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Michael T. Hallam  
40 N. Central Avenue  
Phoenix, Arizona 85004

Attorneys for OCMC, Inc.

VERIFICATION

STATE OF Indiana )  
COUNTY OF Hamilton ) ss.

I, Ann C. Bernard, am General Counsel of OCMC, Inc. I hereby certify that the facts stated in the above Amendment to Application are true and accurate to the best of my knowledge and belief.

Ann C. Bernard  
Ann C. Bernard

Subscribed and sworn to before me this 25<sup>th</sup> day of March, 2004.

Deresa Hamilton  
Notary Public

My Commission Expires:

December 21, 2008





1 ORIGINAL and fifteen (15) copies  
2 of the foregoing filed this 26th day of  
3 March, 2004, with:

4 The Arizona Corporation Commission  
5 Utilities Division – Docket Control  
6 1200 W. Washington Street  
7 Phoenix, Arizona 85007

8 COPIES of the foregoing  
9 hand-delivered this 26th day of  
10 March, 2004, to:

11 Amanda Pope, Administrative Law Judge  
12 Hearing Division  
13 Arizona Corporation Commission  
14 1200 W. Washington Street  
15 Phoenix, Arizona 85007

16 Tim Sabo, Legal Division  
17 Arizona Corporation Commission  
18 1200 W. Washington Street  
19 Phoenix, Arizona 85007

20 Ernest G. Johnson, Director  
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